REPORT TO:	Planning Policy Committee
DATE:	23rd March 2023
SUBJECT:	East Lindsey Local Plan Settlement Pattern
PURPOSE:	To present to Members the final Retail Study reports
KEY DECISION:	N/A
PORTFOLIO HOLDER:	Councillor Tom Ashton
REPORT AUTHOR:	Simon Milson
WARD(S) AFFECTED:	All – the Retail Study covers the whole District.
EXEMPT REPORT?	*No*

SUMMARY

The original retail assessments for Mablethorpe and Skegness were undertaken in 2008, with Louth, Alford and Horncastle being conducted in 2012. A refresh was conducted in 2014. At the time of the submission of this Local Plan review these will be significantly out of date (more than 8 years from the refresh).

To address this, Committee approved a brief to go out to tender to secure updates to the Retail Studies. After a tender process, Nexus Planning Ltd were awarded the contract and have conducted the work. This report presents the completed Retail Study for East Lindsey and the associated appendices, and a Retail Impact Assessment with appendix.

RECOMMENDATIONS

It is recommended that Members approve the Retail Study and associated documents in the appendices to this report for publication and use.

REASONS FOR RECOMMENDATIONS

The Retail Study is the most up-to-date evidence on this subject.

OTHER OPTIONS CONSIDERED

Do not publish/use the Retail Study. This would result in the Local Plan review continuing based on out-of-date evidence, could result in the Plan being found un-sound.

1. BACKGROUND

1.1 It is important that the retail capacity of the towns is fully understood. This assists in assessing the impacts of different policy approaches on the town centres, for example when looking at whether to support more flexible uses on out-of-town employment estates. It also assists in determining planning applications for retail development within the towns ensuring they remain healthy and viable. This is set out in the National Planning Policy Framework, with relevant paragraphs set out below.

1.2 The NPPS inf paragraph 20 sets out (amongst other things) :

> *"*Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision13 for:
>
> a) housing (including affordable housing), employment, retail, leisure and other commercial development; …. "

1.3 The NPP goes on to say in paragraph 86 :

> *"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:*
>
> *a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;*
>
> *b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;*
>
> *c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*
>
> *d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;*

e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and

f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites"

1.4 The Policy of most relevance in the Local Plan is Strategic Policy 14 (SP14) Town/Village Centres and Shopping, and Strategic Policy 15 (SP15) Widening the Inland Tourism and Leisure Economy. This sets out to satisfy the NPPF requirements that Town centres are protected from inappropriate development. It requires a sequential approach for any development over 1000 sq metres in floor space:

3. Proposals for 'edge of' and 'out of centre' retail schemes will be subject to the sequential test to establish and ensure that there are no suitable, available sites in the Town Centre which should be brought forward first.

4. Requiring proposals for retail, leisure and office development in 'edge of centre', or out of centre locations with a floor space in excess of 1000 sqm net to include an impact assessment which must demonstrate;

- ***That the proposal will not be detrimental to existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal.***
- ***That the proposal will not harm town centre vitality and viability, including local consumer choice and trade in the town centre and the wider area, up to five years from the time the application is made.***
- ***For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.***
- ***That the design of any proposal connects to the town centre in that it should not turn its back on the town centre; be an integral part of the character of the street scene, incorporating parking so that it does not dominate the street scene***

2. REPORT

2.1. A In terms of the study area, it should be noted from section 1.5 of the report that the area covers the whole of East Lindsey and also some small sections of neighbouring Boston to cover retail habits that cross boundaries.

2.2. The District is split down into 8 zones with each of them roughly covering one of the main settlements in the District. The table 1.1 below shows this. The work included primary research to investigate shopper trends within the District. It then goes on to assess the vitality and viability of the 8 main settlements and . The report does discuss the impacts of the Covid Pandemic (section 2.3) with further references to the impact later on in the report.

Table 1.1: Study Area Zones by Settlement

Survey Zone	Key Settlements
1	Skegness
2	Chapel St. Leonards, Wainfleet All Saints
3	Coningsby/Tattershall,
4	Spilsby
5	Horncastle
6	Alford
7	Louth
8	Mablethorpe

2.3. The report goes on to look at current market trends, identifying Aldi and Lidl as 'hard discounters' that it considers to be more attractive to buyers during the uncertainty in the economy. Table 2.3 below sets out a useful comparison of the main retailer's market share of convenience goods.

Table 2.3: Market Share of convenience goods operators

Operator	December 2016	December 2017	December 2018	December 2019	December 2020	December 2021
Tesco	28.4	28.1	27.8	27.4	27.3	27.9
Sainsbury's	16.5	16.5	16.1	16.0	15.9	15.7
Asda	15.3	15.3	15.2	14.8	14.3	14.2
Morrisons	10.8	10.8	10.6	10.3	10.4	10.1
Aldi	6.2	6.8	7.4	7.8	7.4	7.7
Co-op	6.3	5.8	5.9	6.1	6.0	5.8
Lidl	4.6	5.0	5.3	5.9	6.1	6.3
Waitrose	5.1	5.2	5.0	5.0	5.0	5.1
Iceland	2.2	2.2	2.2	2.3	2.5	2.4
Symbols & Independent	1.8	1.7	1.5	1.6	1.7	1.6
Other Outlets	1.7	1.6	1.7	1.6	1.8	1.8
Ocado	1.1	1.1	1.2	1.3	1.6	1.7

Source: KANTAR Grocery Market Share. Figures shown are for the final reporting period in each calendar year

2.4. Sections 2.4 to 2.44 consider the impacts of Planning reforms and in particular the changes to the Permitted Development regulations that allow a variety of changes from shops to other uses. Clearly the knock-on effect of this could be the erosion of the primary retail offering in town centres. The Article 4 planning regime allows for Permitted Development Rights to be removed where there is justification, and the report recognises that this could be used as a mechanism to protect the Town Centres.

2.5. Notwithstanding the potential for impact from the Planning reforms, the report in section 2.51 does also advise that there is a need for flexibility in centres. It goes on to say that "vital and viable centres need a varied mix of uses and there is also an identified need to concentrate multi-functional public services in town centre locations to realise agglomeration benefits." This indicates there is a balance to be struck between restricting uses and encouraging a healthy mix to attract greater footfall. In section 2.52 the report recommends that the Authorities policies are "sufficiently flexible so as to allow for a wide range of town centre uses beyond retail…"

2.6. Section 3 of the report sets out the policy context. Sections 3.17 to 3.21 again consider the changes to the use class system.

2.7. Section 4 of the report provides an analysis and summary of the market research that was undertaken. One of the first elements the report looks at is the current market share of the main retailers in the District. This can be seen in table 4.2. This shows that both Aldi and Lidl are trading well in the District.

Table 4.2: Total Convenience Expenditure Summary (Top Ten Destinations)

Convenience Spending Patterns	2021 Study Area Residents' Expenditure	2021 Market Share (%)
Aldi, Newbridge Hill, Louth	44.4	10.6%
Morrisons, Wainfleet Road, Skegness	30.2	7.2%
Morrisons, Eastgate, Louth	27.9	6.6%
Tesco Superstore, Richmond Drive, Skegness	26.0	6.2%
Aldi, Burgh Road, Skegness	25.4	6.0%
Tesco Superstore, Watermill Road, Horncastle	21.1	5.0%
Lidl, High Street, Mablethorpe	18.8	4.5%
Sainsbury's Superstore, Boston Road, Spilsby	17.4	4.1%
Lidl, Richmond Drive, Skegness	12.4	3.0%
Co-op, Conging Street, Horncastle	7.5	1.8%

2.8. The table below (4.3) sets out the retention of convenience goods. The highest level of retention for main food expenditure is Zone 1 (Skegness) with 99.5%, which shows that almost all of local residents needs are met by the existing convenience stores. At the bottom end of the scale are zones 2 and 3, which show residents are having to travel outsides of the zone to find the needed goods. Table 4.3 below goes on to show the leakage from East Lindsey, which comes in at 18.9% or £79.3 million. This expenditure occurs outside of the District.

Table 4.3: Convenience Expenditure Retention by Zone at 2021

Zone	Main Food Expenditure Retention	Top-Up Food Expenditure Retention	Total Convenience Expenditure Retention Per Zone
1- Skegness	99.5%	94.0%	98.2%
2- Outer Skegness	5.7%	70.9%	22.0%
3- Coningsby/Tattershall,	5.6%	58.5%	18.8%
4- Spilsby	48.0%	81.4%	56.3%
5- Horncastle	55.3%	91.6%	64.4%
6- Alford	17.3%	72.2%	31.0%
7- Louth	74.0%	86.1%	77.1%
8- Mablethorpe	71.5%	93.2%	76.9%

Table 4.4: Convenience Goods Expenditure Retention and Leakage

Destinations	2021 Study Area Residents' Expenditure £m	2021 Market Share %
All Destinations Inside East Lindsey Authority Area	336.3	80.1%
All Other Destinations in Study Area	4.3	1.0%
Total - All Destinations Inside Study Area	**340.7**	**81.1%**
Total - All Destinations Outside Study Area	**79.4**	**18.9%**
Total	**420.0**	**100.0%**

2.9. The report then considers Comparison Expenditure. It is clear that Louth is the principal destination for residents, with 16.2% shopping for these goods in the Town. Skegness is close behind at 12% but the other towns do then drop off significantly.

Table 4.5: Total Comparison Expenditure Summary – Principal Destinations (Over 2.0% of Comparison Expenditure)

Convenience Spending Patterns	2021 Study Area Residents' Expenditure	2021 Market Share (%)
Destinations Inside East Lindsey		
Louth Town Centre	73.9	16.2%
Skegness Town Centre	55.0	12.0%
Skegness Retail Park, Wainfleet Road, Skegness	20.5	4.5%
Horncastle Town Centre	16.3	3.6%
Mablethorpe Town Centre	14.6	3.2%
Spilsby Town Centre	9.9	2.2%
Destinations Outside East Lindsey		
Lincoln City Centre	45.9	10.0%
Boston Town Centre	37.8	8.3%
Grimsby Town Centre	29.1	6.4%
Tritton Retail Park, Tritton Road, Lincoln	10.7	2.3%

2.10. The report looks at the same leakage figures in section 4.16 for comparison goods and sets these out in table 4.6 (below). It can be seen that there is higher leakage – coming in at 56.3% or £257.6million. Again this is expenditure that is happening outside of the District.

Table 4.6: Comparison Goods Expenditure Retention and Leakage

Destinations	2021 Study Area Residents' Expenditure £m	2021 Market Share %
All Destinations Inside East Lindsey Authority Area	257.6	56.3%
All Other Destinations in Study Area	0.4	0.1%
Total - All Destinations Inside Study Area	**275.3**	**56.4%**
Total - All Destinations Outside Study Area	**199.4**	**43.6%**
Total	**457.5**	**100.0%**

2.11. Sections 4.17 to 4.37 of the report then breaks down the different types of comparison goods and gives a more detailed analysis of the shopping patterns for each type.

2.12. Sections 4.38 and 4.39 provide a summary of the household survey results (extracts set out below).

Section 4.38 (convenience):

- Overall, the East Lindsey convenience destinations meet both main and top up food shopping requirements for East Lindsey residents in a satisfactory manner; and
- For Zones 1, 2, 4, 6 and 8 more than nine of every ten main food shopping and top-up shopping trips are undertaken to stores within East Lindsey District; for top-up shopping, East Lindsey's market share is above 90% for Zones 5 and 7.

Section 4.39 (comparison):

a. The vast majority of residents in Zones 1, 2, 4, 6, 7 and 8 are able to meet their comparison goods shopping needs within the East Lindsey authority area (principally at Skegness town centre and Louth town centre);

b. The overall clothing and footwear market share claimed by facilities within East Lindsey represents 37.5% of the total market share in the Study Area; and

c. Lincoln town centre draws a relatively high proportion of clothing and footwear trips away from Zones 1, 2, 3, 4 and 5 in particular.

2.13. Section 5 of the Report provides "Health check Assessments" for Alford, Coningsby, Horncastle, Louth, Mablethorpe, Skegness and Spilsby town centres. The consultants carried out site visits in June 2021 to assist with this assessment. The report acknowledges that this was shortly after Step 4 of the reopening after lockdown but advises that the centres were "substantially open for business". It also advises that the assessments are only a snapshot in time and that further issues in relation to Covid may appear in the future.

2.14. Overall the health checks are positive with all centres with all being considered "vital and viable". In terms of vacancy rates all were above the national average 13.9% (July 2021), with the exception of Spilsby having vacancy rates below. Spilsby was only slightly above at 15%. Table 5.3 of the report sets this out in more detail.

2.15. Section 6 of the report goes on to consider Population and Expenditure. A survey of 1000 households was undertaken within the defined Study Area. This considered residents shopping habits. The paragraphs look at the methodology used. The four tables below (6.3 - 6.6) show the expenditure and potential growth for both comparison and convenience goods.

2.16.

Table 6.3: Total Available Study Area Convenience Goods Expenditure

2021 (£m)	2026 (£m)	2031 (£m)	2036 (£m)
420.0	426.7	438.6	450.8

In 2020 Prices

Table 6.4: Growth in Available Study Area Convenience Goods Expenditure

Growth 2021-26 (£m)	Growth 2021-31 (£m)	Growth 2021-36 (£m)
6.7	18.6	30.8

In 2020 Prices

Table 6.5: Total Available Study Area Comparison Goods Expenditure

2021 (£m)	2026 (£m)	2031 (£m)	2036 (£m)
457.5	541.0	624.3	727.4

In 2020 Prices

Table 6.6: Growth in Available Study Area Comparison Goods Expenditure

Growth 2021-26 (£m)	Growth 2021-31 (£m)	Growth 2021-36 (£m)
83.5	166.9	270.0

In 2020 Prices

2.17. Section 7 goes onto consider Retail Capacity. Again the initial paragraphs set out the methodology used. Of particular relevance is section 7.7 where it is stated *"We believe that many of the food shopping trips which originate within the Study Area, but are directed to facilities outside of East Lindsey, occur principally because the trip is convenient (i.e. close to home or work) rather than due to any significant deficiencies in East Lindsey's offer."* The report goes onto set out at the end of that section that the 80.1% existing convenience good market expenditure is broadly appropriate and sustainable.

2.18. Table 7.1 below shows the surplus expenditure that will be available projected into the future. The report also sets out in table 7.2 the committed and implemented convenience goods planning applications that could also impact requirements.

Table 7.1 Quantitative Need for Convenience Goods Floorspace in East Lindsey

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2021	321.1	407.3	86.1
2026	336.1	413.8	77.7
2031	336.8	425.3	88.5
2036	336.8	437.1	100.3

Source Table 6a of Appendix 4
In 2020 Prices

2.19. The report then sets out a breakdown by settlement of the projected floorspace requirements for convenience goods. It can be seen in that table that Skegness, Horncastle, Spilsby and Louth are all expected to have a surplus requirement of floorspace, with Louth in particular as high as 5100 sqm by 2036. In contrast both Alford and Mablethorpe are not showing a requirement for any additional. The report does note that the town benefits from two extant consents for additional convenience floorspace.

2.20. Turning to Comparison Goods, table 7.5 (below) sets out the surplus expenditures projected within the District again up to 2036. It can be seen that the surplus for this type of goods is projected to be more muted over the period.

Table 7.5 Quantitative Need for Comparison Goods Floorspace in East Lindsey

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2021	315.6	315.6	0.0
2026	369.5	373.2	3.8
2031	416.8	430.7	13.9
2036	473.9	501.8	28.0

Source: Table 26a of Appendix 4
Notes: Assumes constant market share (56.3%) of Study Area expenditure claimed by facilities in East Lindsey; allows for changes in benchmark turnover sales efficiency in accordance with Table 4b of Experian Retail Planner Briefing Note 19
In 2020 Prices

2.21. The report again sets out extant permissions that if implemented could impact on requirements. It then provides the same breakdown for comparison goods in by settlement in table 7.8. It can be seen in that table that for all settlements there is no requirement for additional space initially. However, all settlements do see an increasing requirement towards the end of the period, with the exception of Mablethorpe which again does not have a surplus requirement. Section 7.35 of the report sets out that there are relatively elevated levels of comparison goods expenditure leakage, to destinations outside of the study area, including Lincoln, Boston and Grimsby. This offers the potential to look at ways of drawing that back into centres.

2.22. Section 8 of the report sets out the Summary and Recommendations. The report again in the initial sections looks at the retail need. The table 8.1 (below) repeats the breakdown for the four settlements that had a surplus requirement for convenience goods.

Table 8.1: Quantitative Need for Convenience Goods Floorspace in East Lindsey's Town Centres

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
Skegness					
2021	22.6	3.9	18.7	1,400	1,900
2026	19.3	4.1	15.2	1,100	1,500
2031	23.1	4.1	19.0	1,300	1,800
2036	27.3	4.1	23.2	1,600	2,200
Horncastle					
2021	17.8	0.0	17.8	1,300	1,800
2026	17.2	0.0	17.2	1,200	1,700
2031	18.4	0.0	18.4	1,300	1,800
2036	19.7	0.0	19.7	1,400	1,900

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
Spilsby					
2021	15.2	0.0	15.2	1,100	1,500
2026	15.0	0.0	15.0	1,100	1,500
2031	15.8	0.0	15.8	1,100	1,500
2036	16.6	0.0	16.6	1,200	1,600
Louth					
2021	47.8	0.0	47.8	3,600	4,800
2026	46.9	0.0	46.9	3,300	4,500
2031	49.7	0.0	49.7	3,500	4,800
2036	52.6	0.0	52.6	3,700	5,100

Notes: Assumes constant market share of Study Area expenditure claimed by facilities in each respective settlement; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 19; minimum floorspace requirement based on an assumed sales density of £13,656 per sq.m at 2020 (which equates to the average sales density of the 'big four' foodstore operators); maximum floorspace requirement based on an assumed sales density of £10,041 per sq.m at 2020 (which is typical figure for discount operators)
In 2020 Prices

2.23. The report then sets out the overall comparison goods floorspace need across the District after commitments. This can be seen in table 8.2 (below). It is apparent that generally across the District there is no need until after 2031.

Table 8.2 Quantitative Need for Comparison Goods Floorspace in East Lindsey after Commitments

	2022 (sq.m)	2026 (sq.m)	2031 (sq.m)	2036 (sq.m)
Minimum Comparison Goods Requirement	-2,100	-1,600	-400	1,000
Maximum Comparison Goods Requirement	-3,700	-2,800	-700	1,600

Source Table 26d of Appendix 5

2.24. The following sections 8.7 to 8.18 set out individual assessments of each of the settlements. Overall, the assessments paint a reasonably positive picture of the District's town centres.

2.25. The Key Policy Recommendations start at section 8.19 of the report. The report acknowledges paragraph 17 of the Town Centres PPG and goes on to advise in section 8.21 that the authority continues to include “sequential and impact tests” to ensure that future centres are fit for purpose. This approach is already set out in Strategic Policy 14. In section 8.23 it acknowledges the requirement in para 86 of the NPPF to “define the extent of town centres and primary shopping areas”. The report goes onto advise in section 8.25 that there is considered to be no benefit in defining primary and secondary frontages and should instead apply flexibility to promote a wider mix of uses.

2.26. The following sections 8.25 to 8.29 look at defining these areas for East Lindsey. The report advises that for Alford, Conningsby/Tattershall, Horncastle, Mablethorpe and Spilsby there is no requirement to differentiate between a PSA and a wider town centre boundary. However, it advises that for Skegness and Louth a boundary should be included (the recommendation is provided in appendix 5).

2.27. Section 8.30 to 8.45 consider the use of thresholds to trigger the need for an impact assessment. The national threshold is set at 2,500 sqm. Alternative thresholds can be set where there is local justification. The current East Lindsey Local Plan sets the threshold at 1000sqm in Strategic Policy 14. However, following a detailed assessment in those sections of the report, it sets out that and alternative policy approach is recommended. This is set out in section 8.46 (extract below). This approach provides a more tailored set of thresholds taking into account the local circumstances within the District’s towns.

> 8.46 Based on the above, we are of the view that an impact assessment will be necessary to accompany proposals for retail and leisure uses (including those relating to mezzanine floorspace and the variation of restrictive conditions) which are not located within a defined centre where:
>
> - the proposal provides a gross floorspace in excess of 500 sq.m gross; or
> - the proposal is located within 800 metres of Alford, Conningsby, Horncastle, Mablethorpe and Spilsby, and is in excess of 300 sq.m gross.

2.28. The final sections of the report (8.49 – 8.51) set out the monitoring requirements to ensure that the success of the policies is tracked. These are straight forward and include floor space, type/amount, location and retailer, completion of retail floor space, and mix of uses including vacancies. Some of this is already captured in the annual authority monitoring. It also recommends that health checks are carried out either annually or every 2 years.

3. CONCLUSION

3.1 The Retail Study and associated documents supplies important background evidence to be used in the review and will also be used by Development Management Officers when considering planning applications. It is recommended that Members approve the RS for publication and use.

EXPECTED BENEFITS TO THE PARTNERSHIP

The Local Plan assists the Partnership in all its priorities.

IMPLICATIONS

SOUTH AND EAST LINCOLNSHIRE COUNCIL'S PARTNERSHIP

No direct implications. The outcome of the report will inform the review of the East Lindsey Local Plan.

CORPORATE PRIORITIES

The Local Plan assists the Partnership in all its priorities.

STAFFING

None

CONSTITUTIONAL AND LEGAL IMPLICATIONS

Planning and Compulsory Purchase Act 2004

Town and Country Planning (Local Planning)(England) Regulations 2012

DATA PROTECTION

None

FINANCIAL

None

RISK MANAGEMENT

Any risks have been highlighted mitigation/controls suggested

STAKEHOLDER / CONSULTATION / TIMESCALES

None prior to committee.

REPUTATION

None

CONTRACTS

None

CRIME AND DISORDER

None

EQUALITY AND DIVERSITY/ HUMAN RIGHTS/ SAFEGUARDING

None

HEALTH AND WELL BEING

None

CLIMATE CHANGE AND ENVIRONMENTAL IMPLICATIONS

The outcome of the report will affect the distribution of development and so potential future travel patterns across the district

ACRONYMS

None

APPENDICES

(If none then insert the word 'None' and delete the below text/boxes).

Appendices are listed below and attached to the back of the report: -

Appendix A	*230206_East Lindsey Retail Study FINAL*
Appendix B	*220728_Assessment of Impact_update_FINAL*
Appendix C	*Appendix 1 - Impact Assessment*
Appendix D	*Appendix 1 – Study Area Plan*
Appendix E	*Appendix 2 – Household Survey Results*
Appendix F	*Appendix 3 – Healthcheck Assessments*
Appendix G	*Appendix 4 – Quantitative Capacity Assessment*
Appendix H	*Appendix 5 – Recommended Town Centre Boundaries*

BACKGROUND PAPERS

No background papers as defined in Section 100D of the Local Government Act 1972 were used in the production of this report.'

CHRONOLOGICAL HISTORY OF THIS REPORT

Name of body	Date

REPORT APPROVAL	
Report author:	Simon Milson (ELDC)
Signed off by:	Mike Gildersleeves (ELDC)
Approved for publication:	Councillor Tom Ashton (ELDC)